

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**NATIONAL POSTAL POLICY COUNCIL
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS STEVEN W. MONTEITH (USPS-T-4)
(May 19, 2021)**

The National Postal Policy Council ("NPPC"), pursuant to §3020.117 of the Commission's rules of practice, respectfully submits the following interrogatories, number (NPPC/USPS-T4-1 through 4) to United States Postal Service witness Steven W. Monteith (USPS-T-4) and requests a timely answer under oath. If an interrogatory can be answered more accurately by a different witness, please redirect it to the appropriate witness.

Please contact the undersigned with any questions.

Respectfully submitted,

NATIONAL POSTAL POLICY COUNCIL

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NPPC/USPS-T4-1: Please refer to page 15, lines 6 through 11, of your testimony, in which you suggest that Presort mailers might adjust to the proposed new service standards by “enhancements in mail preparation and options to enter mail further into the postal network.” Please describe what “options to enter mail further into the postal network” you contemplate, including in particular whether the Postal Service will offer Presort mailers the option of discounts for destination entry when the new service standards are implemented.

NPPC/USPS-T4-2: Please refer to page 23, lines 21 through 23, of your testimony, Describe all outreach efforts that the Postal Service has made or will make to mailers of remittance mail regarding the proposed reduction in service standards at issue in this proceeding.

NPPC/USPS-T4-3: What steps does the Postal Service contemplate to slow or reverse the decline in First-Class Mail volume projected in the Strategic Plan? In your answer, please provide any estimates of volume retention or growth the Postal Service has identified and any related benchmarks or measures of success that the Postal Service has identified.

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NPPC/USPS-T4-4: Is the Postal Service forecasting volume increases (as compared to FY2020) in First-Class Mail in FY2021 and FY2022? If so, please provide those estimates and indicate whether they are adjusted for the effect of any rate changes (compared to current rates) that would apply in those periods.